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8 9	Attorneys for Plaintiff Entropic Communications, LLC		
10	UNITED STATES DISTRICT COURT		
11	CENTRAL DISTRICT OF CALIFORNIA		
12			
13	ENTROPIC COMMUNICATIONS,		
14	LLC,	Case No.: 2:23-cv-01048-JWH-KES	
15	Plaintiff,	JOINT STATEMENT OF THE	
16	v.	PARTIES IN RESPONSE TO THE ORDER TO SHOW CAUSE RE APPOINTMENT OF A SPECIAL	
17	COMCAST CARLE	APPOINTMENT OF A SPECIAL MASTER	
18	COMCAST CABLE COMMUNICATIONS, LLC; and		
19	COMCAST CABLE COMMUNICATIONS	[Judge John W. Holcomb; Magistrate Judge Karen E. Scott]	
20	MANAGEMENT, LLC	Date: April 21, 2023	
21		Time: 9:00 a.m. Crtm: 9D (Reagan Bldg)	
22	Defendants.	Cruii. 9D (Reagail Blug)	
23	ENTROPIC COMMUNICATIONS,	Case No.: 2:23-cv-01043-JWH-KES	
24	LLC,		
25	Plaintiff,	JOINT STATEMENT OF THE PARTIES IN RESPONSE TO THE	
26	V.	ORDER TO SHOW CAUSE RE APPOINTMENT OF A SPECIAL MASTER	
27	DISH NETWORK CORPORATION;		
28		N DECRONCE TO THE ODDED TO CHOW	
	JOINT STATEMENT OF THE PARTIES IN RESPONSE TO THE ORDER TO SHOW CAUSE RE APPOINTMENT OF A SPECIAL MASTER		

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1	DISH NETWORK LLC; DISH	[Judge John W. Holcomb; Magistrate Judge Karen E. Scott]
2	NETWORK SERVICE, LLC; and DISH NETWORK CALIFORNIA	
3	SERVICE CORPORATION,	Date: April 21, 2023
4	Defendants.	Time: 9:00 a.m.
5	Determine.	Crtm: 9D (Reagan Bldg)
6	ENTROPIC COMMUNICATIONS,	Case No.: 2:23-cv-01047-JWH-KES
7	LLC,	
	Plaintiff,	JOINT STATEMENT OF THE PARTIES IN RESPONSE TO THE
8	V.	ORDER TO SHOW CAUSE RE APPOINTMENT OF A SPECIAL
9	COX COMMUNICATIONS, INC.;	MASTER
10	COXCOM, LLC; and COX	
11	COMMUNICATIONS , LLC,	[Judge John W. Holcomb; Magistrate Judge Karen E. Scott]
12	Defendants.	Date: April 21, 2023
13		Time: 9:00 a.m.
14		Crtm: 9D (Reagan Bldg)
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	-	N RESPONSE TO THE ORDER TO SHOW

Plaintiff Entropic Communications, LLC ("Entropic" or "Plaintiff"), Defendants Comcast Corporation, Comcast Cable Communications, LLC, and Comcast Cable Communications Management, LLC ("Comcast Defendants"), Defendants DISH Network Corporation, DISH Network, L.L.C., Dish Network Service, L.L.C., and DISH Network California Service Corporation ("DISH Defendants"), and Defendants Cox Communications, Inc., CoxCom, LLC, and Cox Communications California, LLC ("Cox Defendants") (together with the Comcast Defendants and the DISH Defendants, "Defendants") (jointly with Plaintiff, the "Parties") hereby submit the following Joint Statement of the Parties in Response to the Court's Order to Show Cause Regarding Appointment of a Special Master. **ENTROPIC'S POSITION** 

Plaintiff consents to the appointment of a special master in this matter for discovery purposes and agrees that the appointment of a special master will promote the expeditious resolution of the Parties' anticipated discovery disputes. For the Court's consideration, Plaintiff proposes David Keyzer as an exemplary candidate for appointment as a special master.

## **DEFENDANTS' POSITION**

Although Defendants do not anticipate any discovery disputes, they consent to the appointment of a special master in this matter for discovery purposes in order to promote the expeditious resolution of any discovery dispute that may arise. Defendants will be prepared to discuss proposals for a special master at the April 21, 2023 hearing.

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## **SIGNATURE CERTIFICATION** 1 2 Pursuant to L.R. 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest that all other signatories listed herein and on whose behalf the filing is submitted concur in the 3 filing's content and have authorized the filing. 4 5 **K&L GATES LLP** 6 Dated: April 14, 2023 By:/s/ Christina N. Goodrich 7 Christina Goodrich 8 Attorneys for Plaintiff Entropic Communications, LLC 9 10 Dated: April 14, 2023 WINSTON & STRAWN 11 By:/s/ Krishnan Padmanabhan Krishnan Padmanabhan 12 Attorneys for Defendants 13 Comcast Corporation; Comcast Cable Communications, LLC; and Comcast 14 Cable Communications Management, LLC 15 Dated: April 14, 2023 KILPATRICK TOWNSEND & 16 STOCKTON LLP 17 By: /s/ April E. Isaacson April E. Isaacson 18 Attorneys for Defendants Cox 19 Communications, Inc.; CoxCom, LLC; and 20 Cox Communications California, LLC 21 Dated: April 14, 2023 FISH & RICHARDSON P.C. 22 By: <u>/s/ Christopher S. Marchese</u> Christopher S. Marchese 23 24 Attorney for Defendants 25 DISH Network Corporation; DISH Network L.L.C.; Dish 26 Network Service L.L.C.; and DISH Network California Service 27 Corporation 28

JOINT STATEMENT OF THE PARTIES IN RESPONSE TO THE ORDER TO SHOW CAUSE RE APPOINTMENT OF A SPECIAL MASTER